

## Gravatt, Dan

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**From:** Paul Rosasco <paulrosasco@emsidenver.com>  
**Sent:** Monday, March 25, 2013 3:06 PM  
**To:** Gravatt, Dan; 'Muenks, Shawn'  
**Cc:** 'Merrigan, Jessie (LG)'; 'Charlotte L. Neitzel'; 'Whitby, Kathleen'; 'Victoria Warren'; steven.golian@em.doe.gov; Asher, Audrey  
**Subject:** RE: Fencing and Signage Plan - West Lake Landfill Operable Unit -1

Dan,

Thank-you for your comments and quick review of the plan. Responses/clarification relative to your questions are provided below.

We were not proposing to do anything relative to the existing three-strand fence that currently exists along the southeast side of Area 2. The location of the proposed new chain link fence does not coincide with the location of the existing three strand fence. The new fence is proposed to be located outside and approximately 100 – 150 feet to the southeast of the existing fence. The location of the existing fence is shown in black (part of the base drawing) on the figure.

Second, we are not proposing to do anything at this time with the existing perimeter fence. We are proposing to install a second layer of perimeter fence in some areas but we would not remove or relocate the existing perimeter fence at this time, except in locations where the existing fencing continues as perimeter fencing and needs repair.

Any existing fencing near RIM that is removed during installation of the new fencing will be screened for radiation and then disposed of as required by the testing results or if negative for radiation and not otherwise contaminated, sold for scrap metal.

The proposed locations of the new fence sections were selected to be well outside of the extent of RIM. That said, we will collect and stockpile any excess soil that is generated during the fence installation and sample the stockpiled soil to determine the appropriate management procedures. If the sample(s) show that soil contains radionuclides at levels greater than 5 pCi/g plus background (the levels used in the SFS), the soil will be placed within the area of RIM occurrences within Area 1 or 2. If does not contain radionuclides above those limits, but contains chemicals at levels that exceed Cleanup Action Levels for Missouri (CALM) but less than toxicity characteristic values, we would dispose of it within Area 1 or 2 outside of the areas of RIM occurrences. If it does not contain radionuclides above the levels used in the SFS or chemicals constituents at levels greater than CALM, then we would leave the soil in stockpile for later use if the volume is significant, or simply spread it out on the ground in vicinity of the stockpile area(s) if the volume is small.

With your approval of the plan we will begin looking for fence contractors with 40-hour trained personnel. Once we identify a contractor to perform the work, we will request that they prepare a health and safety plan or otherwise work with them to prepare one. We will also asked them to provide a schedule. Once we identify a contractor, we anticipate completing the work within 60 to 90 days.

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**From:** Gravatt, Dan [mailto:Gravatt.Dan@epa.gov]

**Sent:** Friday, March 22, 2013 8:07 AM

**To:** Paul Rosasco; 'Muenks, Shawn'

**Cc:** 'Merrigan, Jessie (LG)'; 'Charlotte L. Neitzel'; 'Whitby, Kathleen'; 'Victoria Warren'; steven.golian@em.doe.gov; Asher,

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Audrey

**Subject:** RE: Fencing and Signage Plan - West Lake Landfill Operable Unit -1

Paul,

EPA has reviewed your Fencing and Signage Plan for West Lake OU-1 areas 1 and 2, dated March 21, 2013. The proposed locations of the new and/or improved fencing, as shown on Figure 1 of the Plan, are acceptable to EPA. The fencing materials and configuration (six-foot chain link fence topped with outward-angled barbed wire) are also acceptable to EPA.

There are two minor inconsistencies in the Plan that should be corrected. First, on Figure 1, the fencing on the southeast boundary of Area 2 should be represented with a blue line instead of a dotted green line, to indicate that the existing 3-strand fencing on this internal boundary of Area 2 will be replaced with the six-foot chain link fencing. Second, the text indicates that no changes are anticipated to the facility perimeter fence where it coincides with the perimeter of Area 1 or 2; however, the Figure shows two areas where the facility perimeter fence will be moved or rebuilt slightly outward to provide more of a buffer between the fence and the modeled extent of the radiological areas. The text should be modified to agree with the Figure, and should indicate whether or not the existing "inner" fence line in these areas will be removed.

The plan should describe what will be done with the existing fencing materials that will be removed and any soil excavated to install the new fence posts. EPA recommends that these materials be screened for radiation to determine if special handling is required.

Finally, the Plan should reference a Health and Safety Plan that covers the work under this Plan, and should provide a schedule for the work.

Sincerely,

Daniel R. Gravatt, PG

US EPA Region 7 SUPR/MOKS

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Principles and integrity are expensive, but they are among the very few things worth having.

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**From:** Paul Rosasco [<mailto:paulrosasco@emsidenver.com>]

**Sent:** Thursday, March 21, 2013 6:23 PM

**To:** Gravatt, Dan; 'Muenks, Shawn'

**Cc:** 'Merrigan, Jessie (LG)'; 'Charlotte L. Neitzel'; 'Whitby, Kathleen'; 'Victoria Warren'; [steven.golian@em.doe.gov](mailto:steven.golian@em.doe.gov)

**Subject:** Fencing and Signage Plan - West Lake Landfill Operable Unit -1

Dan,

Pursuant to the March 15, 2013 electronic mail from Audrey Asher of EPA to the OU-1 Respondents, the attached file presents a plan for installation of additional fencing and signage around Radiological Areas 1 and 2.